

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

MAIL PROCESSING NETWORK RATIONALIZATION
SERVICE CHANGES, 2011

Docket No. N2012-1

**RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO AMERICAN POSTAL WORKERS UNION INTERROGATORIES
REDIRECTED FROM WITNESS DAVID WILLIAMS
(APWU/USPS-T1-36 THROUGH 38)**

The United States Postal Service hereby files responses to the above-listed interrogatories of American Postal Workers Union dated February 23, 2012. The interrogatories have been redirected from witness Williams to the Postal Service for the provision of institutional responses. Each interrogatory is stated verbatim and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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**INSTITUTIONAL RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO AMERICAN POSTAL WORKERS UNION INTERROGATORY
REDIRECTED FROM WITNESS WILLIAMS**

APWU/USPS-T1-36 Please confirm that the AMP study process has no accounting for the following “frictional” or transactions costs: Out of schedule premium. For example, in Daytona over a \$.5million was spent on out of schedule premium for employees on temporary detail as a result of transitioning; Travel time, Mileage Per Diem and transportation costs. For example in Daytona the USPS is paying temporarily detailed employees for their travel time, transportation costs and mileage. Transportation of employees from one facility to another. For example in Ashland, KY, the Postal Service is providing buses and vans to transport employees on temporary detail to the gaining facility in Charleston, WV from Ashland. Relocation Benefits; New Training costs, other than maintenance; and Saved grade costs. For example in Daytona, you had 20 employees who received a saved grade.

RESPONSE

It is confirmed that the AMP study process does not include transitional workhour costs as part of the estimate. However, these costs are included in the Post Implementation Review analysis, with the exception of mileage reimbursements (per diem). The PIRs filed in this case indicate that overall, the results of the consolidations exceed the expected savings.

**INSTITUTIONAL RESPONSE OF THE UNITED STATES POSTAL SERVICE
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REDIRECTED FROM WITNESS WILLIAMS**

APWU/USPS-T1-37 Please confirm that the PIR process counts as savings from the AMP the workhour savings resulting from the loss of mail volume over the time of the original AMP and PIR.

- a) Please also confirm that the PIRs include the savings resulting from concurrent initiatives workhour savings that are unrelated to the AMP, such as the Early Retirement program.

RESPONSE

The loss of mail volume over time is captured in the PIR evaluation in addition to the savings associated with consolidation.

- a. Not confirmed. Note, the early retirement program was a program intended to reduce the workforce. That workforce reduction was necessitated by the combined impact of the workload declines, as well as the savings expected through the mail processing operations. The early retirement program provided the Postal Service the ability to achieve the expected savings associated with the AMPs.

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APWU/USPS-T1-38 Confirm that Charleston, WV received 3 machines from Ashland, KY and 4 additional machines from other locations.

- a) Please confirm that the AMP shows that Ashland, KY saved \$44,758.00 as a result of moving the three machines to Charleston, WV, while there is no increase in Part, Supplies, and Facility Utilities listed for Charleston, WV despite its gaining the 3 Ashland machines and 4 others.
- b) What instructions are given to the field to account for changes in Part, Supplies and Facility Utilities as a result of an AMP.

RESPONSE

- a. Confirmed that Charleston received 3 machines from Ashland and there was an estimated savings in Ashland of \$44,758. There was no increase in parts at Charleston. Utilities were increased in the Huntington AMP by \$29,300.
- b. Field personnel are instructed to transfer usable spare parts along with equipment as a result of the AMP. Any excess, usable spare parts are instructed to be identified to District, Area, or Headquarters maintenance to be redeployed to alternate facilities. Additional orders for spare parts that are no longer necessary are to be halted. There are no specific instructions regarding utilities unless the facility is closing. If that is the case, the facility is turned over to Asset Management and Facilities for cancellation of the utilities services and disposition of the asset.